



Comcast Corporation
300 New Jersey Avenue, NW
Suite 700
Washington, DC 20001

November 18, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Proposed Extension of Part 4 of the Commission's Rules Regarding Outage
Reporting, PS Docket No. 11-82, *Ex Parte*

Dear Ms. Dortch:

On November 16, 2011, the undersigned of Comcast Corporation and Jeffery Goldthorp of the Commission's Public Safety and Homeland Security Bureau discussed via telephone the issues raised in the above-captioned proceeding. In particular, in response to an inquiry from Mr. Goldthorp, I explained that Comcast has filed comments in this proceeding in which it generally supported adapting, with certain modifications, existing network outage reporting obligations to interconnected voice-over-Internet-Protocol providers in light of the consumer transition from traditional telephone services to VoIP services. Comcast, however, opposes the extension of such requirements to broadband Internet access services or Internet backbone services because such an extension would be redundant, costly, burdensome, and legally suspect.¹

Pursuant to section 1.206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1), this *ex parte* notification is being filed for inclusion in the public record of the above referenced proceeding.

Sincerely,

/s/ Mary McManus
Mary McManus

cc: Jeffery Goldthorp

¹ Comments of Comcast Corp., PS Docket No. 11-82 (Aug. 8, 2011). *See also* Ex Parte Letter of Barbara Esbin, Counsel to the American Cable Ass'n, et al, to James A. Barnett, Jr., Rear Admiral (Ret.), Chief, Public Safety and Homeland Security Bureau, PS Docket No. 11-82 (Nov. 14, 2011) (ex parte letter from ISPs and trade associations, including Comcast, explaining why the proposed rules "are unnecessarily broad and are not narrowly tailored to the Commission's stated goal of ensuring reliable access to 9-1-1 systems").